

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD MARCH 1, 2022 THROUGH MARCH 31, 2022**

Debtor: LTL Management LLC

Applicant: Wollmuth Maher & Deutsch LLP

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition
Date")

**SECTION 1
FEE SUMMARY**

X Monthly Fee Statement No. 5 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from March 1, 2022 through March 31, 2022
(the "Fifth Statement Period").

Total Fees:	\$300,746.00
Total Disbursements:	\$2,790.92
Total Fees Plus Disbursements:	\$303,536.92
Minus 20% Holdback of Fees:	\$60,149.20
Amount Sought at this Time:	\$243,387.72

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	<u>\$1,185,773.75</u>	<u>\$15,629.52</u>
Total Fees Allowed to Date:	<u>0</u>	<u>0</u>
Total Retainer (If Applicable):	<u>0</u>	<u>0</u>
Total Holdback (If Applicable):	<u>\$237,154.75</u>	
Total Received by Applicant:	<u>\$948,619.00</u>	<u>\$15,629.52</u>

Name of Professional & Title	Year Admitted	Hours	Rate	Fees
Paul R. DeFilippo, Esq., Partner	1978	92.3	\$925	\$82,880.00
James N. Lawlor, Esq., Partner	1992	91.9	\$875	\$80,412.50
Lyndon M. Tretter, Esq., Partner	1986	7.4	\$875	\$6,475.00
Joseph F. Pacelli, Esq., Associate	2020	117.8	\$580	\$67,570.00
Brian Y. Umana, Esq., Associate	2021	21.0	\$425	\$8,925.00
Stephanie A. Weaver, Law Clerk (Admission Pending)	N/A	116.9	\$340	\$39,746.00
Anthony A. Hallums, Paralegal	N/A	32.4	\$225	\$6,615.00
Michele Klinger, Paralegal	N/A	14.3	\$225	\$3,217.50
Scarlet E. Meltzer, Paralegal	N/A	17.8	\$225	\$4,005.00
Celenydiana Rodriguez, Paralegal	N/A	4.0	\$225	\$900.00

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	0
b) Asset Disposition: Sales, leases, abandonment and related transaction work.	0	0
c) Avoidance Action Litigation: Preference and fraudulent transfer litigation.	0	0
d) Business Operations: Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	0
e) Case Administration: Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	107.7	\$43,334.00
f) Claims Administration and Objections: Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0	0
g) Employee Benefits/Pensions: Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0	0
h) Fee/Employment Applications: Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	148.8	\$73,571.50
i) Fee/Employment Objections: Review of an objections to the employment and fee applications of others.	16.5	\$14,047.50
j) Financing: Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0	0
k) Litigation: Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	198.6	\$140,668.00
l) Meeting of Creditors: Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	0	0

SERVICES RENDERED	HOURS	FEES
m) Plan and Disclosure Statement: Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0	0
n) Relief from Stay Proceedings: Matters relating to termination or continuation of automatic stay under 362.	30.2	\$25,198.50
o) Accounting/Auditing: Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0	0
p) Business Analysis: Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0	0
q) Corporate Finance: Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0	0
r) Data Analysis: Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0
s) Litigation Consulting: Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0
t) Reconstruction Accounting: Reconstructing books and records from past transactions and bringing accounting current.	0	0
u) Tax Issues: Analysis of tax issues and preparation of state and federal tax returns.	0	0
v) Valuation: Appraise or review appraisals of assets.	0	0
w) Travel Time	14.0	\$3,926.50
SERVICE TOTALS	515.8	\$300,746.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
Q1 2022 - PACER Service – Access to Court Electronic Records	\$533.30
03/08/2022 - Local Travel (JFP to/from Court)	\$31.82
03/08/2022 - Parking (JFP)	\$12.00
03/09/2022 - J & J Court Transcribers, Inc. inv # 2022-00476	\$798.60
03/13/2022 - Elite (Car Service) Inv. # 1846168	\$290.57
02/20/2022 - Elite (Car Service) Inv. # 1846168	\$326.03
03/21/2022 - J & J Court Transcribers, Inc. inv # 2022-00561	\$72.60
03/31/2022 - J & J Court Transcribers, Inc. inv # 2022-00622	\$726.00
DISBURSEMENTS TOTALS	\$2,790.92

SECTION IV CASE HISTORY

1. Date of Retention: December 16, 2021, effective as of November 12, 2021 [Dkt. 851] (the “Retention Order”).¹
2. Summary explaining the nature of the work performed and the results achieved:
 - Facilitated the drafting, finalization and filing of (i) several oppositions and responses, including the: opposition to the TCC II letter motion for continued existence, opposition to motions for direct certification to the Third Circuit, opposition to motion for appointment of a second Future Talc Claims Representative (“FTCR”), opposition to lift stay motion, response in support of the U.S. Trustee’s motion to appoint a fee examiner, and response in support of retention applications, (ii) consent order related to establishing briefing schedule related to motions filed by the TCC II, (iii) adversary complaint for a temporary restraining order and preliminary injunction, and attendant motion and application for an order shortening time, (iv) first interim fee applications for the Debtor’s professionals, (v) monthly fee statements for the Debtor’s professionals, (vi) certifications of no objection regarding monthly fee statements, (vii) Debtor’s monthly operating report, (viii) ordinary course professional declarations, (ix) letters to the Court regarding appointment of the FTCR, (x) notices of appearance in recently opened appellate dockets, and (xi) hearing agendas;
 - Analyzed issues and counseled the Debtor with respect to, among other things, (i) reconstitution of the TCC, (ii) retention of the Debtor’s professionals, (iii) appointment of a fee examiner, (iv) motion to lift stay, (v) selection of FTCR, and (vi) appeals of the motion to dismiss, preliminary injunction, Skadden retention, and Jones Day retention orders;
 - Participated in the hearings and conferences held during this period, and counseled the Debtor with respect thereto;
 - Monitored recently opened appellate dockets; and
 - Interfaced on a daily basis with the Debtor and/or its other professionals to facilitate the Debtor’s administrative processes, including adherence to the local bankruptcy rules and filing procedures.

I certify under penalty of perjury that the above is true.

Date: April 20, 2022

/s/ Paul R. DeFilippo
Paul R. DeFilippo

¹ The Retention Order is attached hereto as Exhibit A.